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Remarks

Claims 89-123 are pending in this application. Claims 89-123 are rejected. No new matter has been added. It is respectfully submitted that the pending claims define allowable subject matter.

Claim 102 has been objected to for informalities. Applicants have amended claim 102 to replace "an objection recognition system" with "an object recognition system" as suggested. Accordingly, Applicants submit that the objection to claim 102 should be withdrawn. Additionally, Applicants have amended claim 91 to correct a minor typographical error.

Claims 90 and 91 have been rejected under 35 U.S.C. §112, first paragraph for failing to comply with the written description requirement. The Office Action states (on page 2) that the recitation in claim 90 that a "video segment is recorded entirely before being retrieved by said PDA" and the recitation in claim 91 of a "pre-recorded video segment" were not previously described in the specification. Applicants respectfully traverse this rejection. Applicants respectfully submit that the application as filed supports these recitations. As one example for support for these recitations, starting at line 16 on page 11 and ending at line 3 on page 12 of the application as filed, the specification describes retrieving a playback video segment and displaying that video segment instead of the live video. Accordingly, if live video is stopped, the playback video segment must necessarily be pre-recorded or entirely recorded before being retrieved by the PDA, otherwise nothing will be displayed. Accordingly, Applicants submit that the 35 U.S.C. § 112 rejection of claims 90 and 91 should be withdrawn.

Claims 89, 92-116 and 118-123 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Monroe (U.S. Patent Application Publication 2004/0117638), hereafter Monroe 1, or DeLean (U.S. Patent Application Publication 2003/0190076) in view of Monroe (U.S. Patent 6,518,881), hereafter M 2. Claim 117 has been rejected under 35 U.S.C. §103(a) as

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being unpatentable over Monroe 1 in view of Swanson, et al. (U.S. Patent 5,689,442), hereafter Swanson. Applicants respectfully traverse these rejections for the reasons set forth hereafter.

Independent claim 89 recites a security system comprising, among other element, a portable personal digital assistant (PDA) wirelessly coupled to an object recognition system and a camera. The PDA is configured to receive an identification signal from the object recognition system and in response thereto provide a command signal to retrieve a recorded video segment (of a video signal corresponding to a detected object). Independent claim 114 recites a method of providing security information comprising, among other elements, providing an identification signal to a PDA when an object matches a stored object and upon a request from the PDA (based on the identification signal) communicating a stored video segment to the PDA of the detected object.

None of the cited art describes or suggests a security system wherein a PDA provides a command signal or request to retrieve recorded video of a detected object based on an identification signal from an object recognition system as recited in claims 89 and 114. The Office Action at page 3 recognizes that although Monroe 1 and DeLean may provide an indication to a mobile device based on a detected object (e.g., notification of a facial match in Monroe 1 or sending a message in DeLean), these references do not teach providing in response to an identification signal, a command signal or request from a PDA to retrieve the recorded video segment corresponding to the detected object. In these systems, the image or other video information is forwarded to the mobile device with the indication and no command signal is taught.

The Office Action then states it would have been obvious to one of ordinary skill in the art to retrieve a stored video signal when needed, such as for security verification (citing Monroe 2). Nothing in Monroe 2 or any of the cited art makes up for the deficiencies in Monroe 1 and DeLean. Specifically, nothing in Monroe 2 or any of the cited art teaches providing a command

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signal or request to retrieve a recorded video segment *in response to* an identification signal received by the PDA. Claims 89 and 114 recite wherein the stored video segment is provided to the PDA upon receiving a command signal or request from the PDA, which command signal or request is based on or in response to the identification signal. The Office Action states that a PDA is “well known having communication ability to retrieve video signal *when needed...*” (Office Action, page 3, italics added). However, claims 89 and 114 recite providing the command signal or request *based on or in response to an identification signal*.

The Supreme Court has recently explained that “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art.” *KSR Int'l Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1741 (2007). Further, courts must “look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue.” *KSR* at 1740-1741. The Court stated that the above analysis should be made explicit, and that it is important “to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR* at 1741. The Office has asserted a reason for combining the references, but not one that supports a teaching of all the elements recited in claims 89 and 114. Thus, even assuming arguendo that there is reason to combine the references as suggested in the Office Action, the combination still fails to teach all the elements recited in claims 89 and 114. Accordingly, Applicants submit that the cited prior art fails to support the rejection of claims 89 and 114.

Moreover, there is no need to provide such a command signal or request in the systems of Monroe 1 and DeLean because those systems already forward the recorded information to the viewing device when the alert is sent. It would not be obvious to try something that is already provided by the system.

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Additionally, the cited art does not describe or suggest a portable security device configured to collect non-image security data and transmit that data to an objection recognition system as recited in claim 102. Monroe 1 fails to teach a portable security device that can collect non-image security data that can be transmitted to an object recognition system. Any information or images that are captured, are not captured by the mobile stations of Monroe 1. Rather, any such data is acquired by separate devices in Monroe 1, such as barcode readers, a surveillance camera in a patrol car, etc. Nowhere in Monroe 1 is the mobile station, including the PDA capable of acquiring non-image security data. The Office Action states at page 5 with respect to Monroe 1 that the data collection device may be in communication with an object recognition system and a security device may be portable. These are two different devices and the portable device does not acquire the non-image security data.

Monroe 2 teaches a mobile device for a patrol car that includes a video screen and has a barcode reader and a magnetic stripe reader. The mobile device communicates with the car radio system to communicate with a central base station. There is simply no motivation to combine these references, as the functionality provided by the mobile device of Monroe 2 is already provided in the system of Monroe 1 using other acquisition devices. Thus, not only is it not obvious to combine these references, it would not have been obvious to try by one of ordinary skill in the art. Accordingly, the prior art fails to teach the portable security device recited in claim 102.

Moreover, including the barcode reader in a portable device can have an adverse affect on the system of Monroe 1, and specifically, can have an adverse effect on the intended purpose of the system. In particular, and with respect to the baggage check application of Figure 11 of Monroe 1 that was cited in the Office Action, in order to scan all luggage, the barcode reader must be placed in close proximity to the luggage and should be stationary to ensure all luggage passing inline are scanned. Making the barcode reader portable not only increases the likelihood that some baggage might not be scanned (e.g., missed when the portable device is moved), but a

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user having to hold the device close to the luggage may not be able to probably view the display or respond to other alerts. Accordingly, the portable device of Monroe 1 can fail its intended purpose if a barcode reader were provided in this mobile device. Thus, Applicants respectfully submit that the combination of Monroe 1 and Monroe 2 is also not proper.

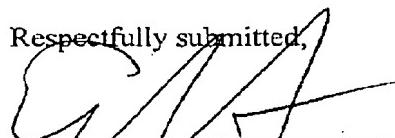
Further, Swanson fails to make up for the deficiencies of the other cited art with respect to the independent claims.

Dependent claims 103-106 recite further allowable subject matter relating to a proximity card detector. Applicants respectfully disagree that a proximity card detector is the same as a magnetic stripe reader as stated in the Office Action at page 5. A proximity card detector is a different device and does not have to come into contact with a card like a magnetic stripe reader.

Further, it is respectfully submitted that the other dependent claims recite additional features that are neither anticipated nor rendered obvious by the prior art. Additionally, the dependent claims are also allowable based at least on the dependency of the dependent claims from the independent claims.

In view of the foregoing amendments and remarks, it is respectfully submitted that the prior art neither anticipates nor renders obvious the claimed invention. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,


Evan Keno Sotiriou, Reg. No. 46,247
THE SMALL PATENT LAW GROUP LLP
611 Olive Street, Suite 1611
St. Louis, MO 63101
(314) 584-4080